

**Appendix F4: Department of Toxic Substances Control
Comments on the Administrative Draft
Environmental Impact Report (ADEIR) for
the Butcher-Solana Residential
Development Project (also known as
Solana Torrance, DTSC Site Code 401791)**

Appendices

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March 19, 2019

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DTSC COMMENTS ON THE ADMINISTRATIVE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE BUTCHER-SOLANA RESIDENTIAL DEVELOPMENT PROJECT, SOUTHWEST CORNER OF HAWTHORNE BOULEVARD AND VIA VALMONTE, TORRANCE, LOS ANGELES COUNTY

Dear Mr. Santana:

The Department of Toxic Substances Control (DTSC) has reviewed the Administrative Draft Environmental Impact Report (ADEIR) for the Butcher-Solana Residential Development Project (also known as Solana Torrance, DTSC Site Code: 401791) received by DTSC on February 25, 2019.

Based on a review of the ADEIR, DTSC would like to provide the following comments:

Chapter 5.2 Air Quality:

1. Page 5.2-21, Construction Emissions – This section should account for the import of engineered fill which would also be utilized as a cap for the presumptive remediation in the development area.

Chapter 5.3 Biological Resources:

2. DTSC will defer evaluation of Biological Resources to the US Fish and Wildlife to identify any concerns with the presumptive remediation in the development area. An ecological screening evaluation may be necessary to demonstrate that

existing habitats and biota will not be adversely affected by the proposed development and contaminants left in place.

3. Page 5.3-10, Mitigation Measures, BIO-1 – It's recommended that the proposed mitigation BIO-1 is consistent with Staff Report on Burrowing Owls published by Department of Fish and Wildlife on March 7, 2017 (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline=true>). This staff report should also be referenced in the DEIR.
4. Page 5.3-22, BIO-4, first bullet – This section recommends conducting surveys prior to ground disturbance activities. It is not stated that such survey will be conducted by a qualified biologist. It appears that a qualified biologist will be contact only if active nests are found. Please ensure that the survey prior to the ground disturbance is conducted by a qualified biologist.

Chapter 5.7 Hazards and Hazardous Material:

5. Page 5.7-8, *California Land Reuse and Revitalization Agreement* – For clarification purposes, CLRRRA is the legally binding mechanism used for DTSC's oversight of the environmental investigation. The Report of Findings was prepared pursuant to CLRRRA. Therefore, investigation findings summarized in the ADEIR should reference the Report of Findings (Kennedy/Jenks, August 2018) instead of reference to the CLRRRA.
6. Page 5.7-8, *California Land Reuse and Revitalization Agreement*, first paragraph, third sentence – The last part of the sentence should reflect the development area rather than the larger project site to be consistent with the succeeding statement.
7. Page 5.7-8 *California Land Reuse and Revitalization Agreement*, second paragraph – Please reference DTSC's Adequacy of Report of Findings dated August 23, 2018.
8. Page 5.7-9, *Soil and Soil Vapor Sampling and Testing*, third paragraph – Please add total petroleum hydrocarbons, pesticides, and asbestos to the list of chemical analysis.
9. Page 5.7-9, *Soil and Soil Vapor Testing Results* – Please revise the term Residential Screening Levels to read Regional Screening Levels.
10. Page 5.7-9, Metals, arsenic discussion - 12 mg/kg of arsenic is a DTSC established background level and not a Regional Screening Level. Refer to the *Human Health Risk Assessment* Section on page 5.7-11 and comment #6.

11. Page 5.7-11, *Human Health Risk Assessment*, fourth paragraph – Please note that DTSC is also utilizing an attenuation factor of 0.03 recommended by EPA for predicting indoor air concentrations. Until the new attenuation factor is officially implemented by DTSC, it is recommended that soil vapor data be screened by using both the current (0.001) and pending (0.03) attenuation factor to calculate vapor intrusion.
12. Page 5.7-11, *Human Health Risk Assessment*, third paragraph, eighth sentence – “Because the background, naturally occurring concentrations of arsenic...” this sentence is not clear and should be revised. Suggested language: “DTSC established a regional background arsenic concentration of 12 mg/kg in soil that can be used as a screening tool for sites throughout southern California.”
13. Page 5.7-11, *Human Health Risk Assessment*, fourth paragraph – The first sentence is not clear, please consider revising or eliminating ‘indoor air risk’ from the start of the sentence.
14. Page 5.7-11, *Benzene* – Please revise the screening level for benzene to reflect a .097 ug/l concentration.
15. Page 5.7-12, *Response Plan*, last sentence – Please refer to DTSC’s Adequacy of Report of Findings for the proposed mitigation measures to manage potential risk posed by contaminants detected at the Site. DTSC understands that the applicant is planning to develop a Response Plan pursuant to CLRRRA that will include measures such as: capping, vapor mitigation, land use restrictions, and long-term operations and maintenance.
16. Page 5.7-12, *Other Topics Addressed by the CLRRRA* – Please see comment #1.
17. Page 5.7-14, Impact 5.7-2 – This section should include analysis of dust generated during development activities which would potentially contain contaminated fill material listed in the proceeding section (Impact 5.7-3). Dust generation and control measures would need to be addressed in the Response Plan.
18. Page 5.7-14, Operation, Impact 5.7-3 – List of contaminants is incomplete in the header section. Please reflect the complete list of contaminants included in the previous section (*Fill Material Investigation*) or include a general category of multiple contaminants within the same group of analytes (e.g. PCBs, SVOCs).
19. Page 5.7-14, Impact 5.7-3, first paragraph – Please revise as follows: ‘The potential risks from chemicals in soil and soil vapor are higher than DTSC’s target risk levels for unrestricted land use, indicating the potential for unacceptable risks if the proposed development are were to be redeveloped...’

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20. Page 5.7-14, Impact 5.7-3, second paragraph – The Report of Findings did not include a recommended remedy for the development, therefore the third sentence should be eliminated. Also, please revise the last sentence as follows: 'This impact is potentially significant.'
21. Page 5.7-15, Level of Significance Before Mitigation, Impact 5.7-3 – Please revise the word 'substantial' to 'potential for unacceptable' human health risks without mitigation.
22. Page 5.7-15, Mitigation Measures, Impact 5.7-3, HAZ-1, first bullet – Please revise the word 'substantial human health risks' to 'potentially unacceptable human health risks'.
23. Page 5.7-15, Mitigation Measures, Impact 5.7-3, HAZ-1 – Mitigation measures included in the Geology and Soils Mitigation Measures (Impact 5.5-2, GEO-1) should also be incorporated in the HAZ-1 section. The minimum required thickness of the cap will be determined in the Response Plan. Please refer to DTSC's Adequacy of Report of Findings letter dated August 23, 2018.
24. Page 5.7-15, Mitigation Measures, Impact 5.7-3, HAZ-1 – In the event that a limited soil excavation is required during the Response Plan and as discussed in the Air Quality Chapter (Construction Emissions section, Page 5.2-21), contingencies for soil excavation should be included in the HAZ-1 section.
25. Page 5.7-16, Mitigation Measures, Impact 5.7-3, HAZ-1, ninth bullet – This section should also include preparation of a soil management plan that provides procedures for the effective handling of soil and prompt communication of the discovery of unknown environmental features.

Other:

26. The DEIR traffic analysis should address the environmental impacts associated with implementation of the Response Plan.

Thank you for the opportunity to review the ADEIR. If you have any questions or would like to discuss any of the above comments, please contact me at (714) 484-5450 or at rana.georges@dtsc.ca.gov.

Sincerely,



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